



EPSTEIN DRANGEL LLP

60 East 42nd Street, Suite 1250, New York, NY 10165
T: 212.292.5390 • E: mail@ipcounselors.com
www.ipcounselors.com

March 12, 2025

VIA ECF

Hon. Denise L. Cote
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Denied.
Denise Cote
3/12/25

Re: *FoxMind Canada Enterprises Ltd. v. Aiqi Toy Store, et al.*
Case No. 24-cv-8341 (DLC)
Second Request for Extension of Time to File Motion for Default Judgment Against Unknown Address Defendants

Dear Judge Cote,

We represent Plaintiff FoxMind Canada Enterprises Ltd. ("Plaintiff"), in the above-referenced action (the "Action").¹ On December 18, 2024, the Court issued an Order stating, *inter alia*, that if any of the Unknown Address Defendants² are in default, Plaintiff shall file a Motion for Default Judgment by no later than January 17, 2025. (Dkt. 22). On January 13, 2025, Plaintiff wrote a letter to the Court requesting an extension of time to file its motion for default judgment against the Unknown Address Defendants. (Dkt. 32). On January 14, 2025, the Court granted Plaintiff's request, directing Plaintiff to file its motion for default judgment against the Unknown Address Defendants by no later than March 14, 2025 and adjourning the default judgment hearing from February 7, 2025 at 2:30 p.m. to April 4, 2025 at 2:30 p.m. (Dkt. 34).

Presently, only four (4) of the Unknown Address Defendants, Dancbor, DaZhong, IFPPSAE and SULLKES remain in this action. As a result, Plaintiff's motion for default judgment would only be against four (4) Defaulting Defendants as Plaintiff is awaiting service via the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters (the "Hague") on the remaining ten (10) Defendants in the Action³ (the "Hague Defendants"). Accordingly, so as not to waste the Court's time and resources on multiple identical motions for default judgment, Plaintiff respectfully requests a second extension of time to file its motion for default judgment against Unknown

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff's Complaint or Application.

² The Unknown Address Defendants include Defendants Dancbor, SHIYAN Shop, SULLKES, DaZhong, easygoing186, IFPPSAE, Sufelix and powerasus. The following Unknown Address Defendants have since been voluntarily dismissed from the Action: easygoing186, powerasus, SHIYAN Shop and Sufelix.

³ Plaintiff is currently in the process of serving the following ten (10) Defendants through the Hague: Flatroad, Jasion US Online, JX TOY, PiuPiuPiu Bubbles Store, Rllept, SHUINIU OUTDOOR, Sunskang, Tayculer, TOFENGLY and Yunevian.

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Address Defendants until it receives the Hague service results for the Hague Defendants. In addition, Plaintiff respectfully proposes updating the Court with respect to Hague service every sixty (60) days until all Defendants in the Action have been served at which time Plaintiff will move for default judgment.

In accordance with Your Honor's Individual Practices, Plaintiff respectfully submits the following:

1. **The original due date:** Plaintiff's deadline to file its motion for default judgment against the remaining Unknown Address Defendants is March 14, 2025.
2. **The number of previous requests for adjournment or extensions of time:** This is Plaintiff's second request for an extension of time to file its motion for default judgment against the Unknown Address Defendants.
3. **Whether these previous requests were granted or denied:** Plaintiff's first request for an extension of time to file its motion for default judgment against the Unknown Address Defendants was granted. (Dkt. 34).
4. **Whether the adversary consents, and, if not, the reasons given by the adversary for refusing to consent:** All of the Unknown Address Defendants remaining in the Action are currently in default, thus Plaintiff did not seek their consent.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: /s/ Gabriela N. Nastasi

Gabriela N. Nastasi

gnastasi@ipcounselors.com

60 East 42nd Street, Suite 1250

New York, NY 10165

Telephone: (212) 292-5390

Facsimile: (212) 292-5391

Attorneys for Plaintiff